

# EXHIBIT 11

FORMER GOV KENNETH E. MAPP Confidential  
Gov of the US Virgin Islands vs JP Morgan Chase

May 24, 2023

1

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 22-cv-10904

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A.,

Defendant.

\_\_\_\_\_/

\*CONFIDENTIAL\*

VIDEO DEPOSITION OF  
FORMER GOV. KENNETH E. MAPP

Wednesday, May 24, 2023

9:48 a.m. - 5:03 p.m.

Conducted at  
Losey, PLLC  
1420 Edgewater Drive  
Orlando, Florida 32804

Reported by:

Janet Hamilton, RPR, CRC, FPR  
Job No.: J9718146

AUSTIN REDCAY, Videographer  
LOUWHAN WELCH, Exhibit Technician (via Zoom)

1 Q. Did you discuss with anyone while you were  
2 governor the fact that Mr. Epstein was required to  
3 register as a sex offender?

4 A. No.

5 Q. Did you ever discuss with Mr. Epstein his  
6 prior conviction for sex crimes?

7 A. No. No.

8 Q. Did you discuss with the Virgin Islands  
9 Police Department the monitoring of Mr. Epstein under  
10 the sex offender registry laws while you were  
11 governor?

12 MR. ACKERMAN: Object to form.

13 A. No. And I don't even know if that's the  
14 jurisdiction of the police department or the  
15 Department of Justice. I don't know.

16 Q. (By Ms. Ellsworth) Did you ever discuss  
17 with the Department of Justice --

18 A. No.

19 I'm sorry.

20 MR. ACKERMAN: Let her finish.

21 Q. (By Ms. Ellsworth) -- the monitoring of  
22 Mr. Epstein under the sex offender registry laws while  
23 you were governor?

24 A. No.

25 Q. What was your reaction to learning the fact

1 that Mr. Epstein had been convicted of a sex crime?

2 A. Surprised. A little shocked. Certainly  
3 wouldn't know the veracity of the case or whatever.  
4 Actually, I have to say after leaving  
5 Government House, like from the media and the reports,  
6 I kind of learned a lot more than I knew. Even  
7 reading some of the documents pertaining to this case,  
8 I -- I don't know. But if it's even 50% accurate, I  
9 did not know the level of those things at that time.

10 Q. And I think you testified that it would  
11 have been at some point by 2015 you were aware of  
12 Mr. Epstein's prior sex crime conviction. Correct?

13 A. I would have. Yes.

14 Q. Did you ever ask him any questions about  
15 it?

16 A. No.

17 Q. Did you ever ask Cecile de Jongh any  
18 questions --

19 A. No.

20 Q. -- about Mr. Epstein's sex crimes  
21 convictions?

22 A. No.

23 Q. Did you ever ask anybody at the Economic  
24 Development Authority if they were aware of  
25 Mr. Epstein's prior conviction for a sex crime?

1 Q. Did you ever receive any information while  
2 you were governor, from 2015 to 2019, that Mr. Epstein  
3 was engaged in improper behavior in the United States  
4 Virgin Islands?

5 A. No.

6 Q. What would you have done if you had  
7 received that information?

8 A. I don't know what I would have done.  
9 Because -- no one raised that issue with me. So...

10 I guess if someone -- I relied on my  
11 attorney generals and my police commissioners and my  
12 counsels around me. So I -- I -- I don't know.

13 You're asking me to speculate what I would  
14 have done.

15 I would have probably given it off to one  
16 of them.

17 THE WITNESS: This is going to go a little  
18 bit beyond, but I think it's necessary.

19 MR. ACKERMAN: Answer the question. Just  
20 answer the question.

21 THE WITNESS: All right.

22 A. Well, I think it's speculative. And I  
23 don't know. Because I wasn't -- I wasn't confronted  
24 with any information for which I would have had to  
25 take any action.

1 Q. (By Ms. Ellsworth) Fair to say you didn't  
2 have any information that gave you cause to ask  
3 anybody to investigate Mr. Epstein. Correct?

4 A. That is fair to say.

5 Q. And you certainly didn't ask your attorney  
6 general to take any action in relation to  
7 Mr. Epstein --

8 A. No.

9 Q. -- during the time that you were governor?

10 A. No.

11 Q. And you didn't ask the Virgin Islands  
12 Police Department to take any action pertaining to  
13 Mr. Epstein while you were governor. Correct?

14 A. No.

15 Q. Did you -- have you ever seen an article  
16 that was published in "The Miami Herald" at some point  
17 in the fall of 2018 about Mr. Epstein?

18 A. No. The fall of 2018 would have placed me  
19 at the doorstep of my reelection. The vote for the  
20 reelection. And, again, really in the midst of a lot  
21 of response to the disaster and the hurricanes. You  
22 know. So I wasn't online reading papers. And  
23 certainly I don't believe at that point the  
24 Virgin Islands was getting the daily periodicals from  
25 the mainland. So --

1 No.

2 Q. You testified earlier that after you left  
3 Government House in early 2019 you came to learn more  
4 about Mr. Epstein. Do I have that correct?

5 A. Yes.

6 Q. How did you come to learn more about  
7 Mr. Epstein after you left Government House?

8 A. Well, at that point I was really more  
9 deeply involved in the care of my mom, who was ailing.  
10 And I would be watching the news more. I would have  
11 the news on in the background, particularly when I was  
12 at my mom's home. And I would begin to -- you know.  
13 You hear these stories. And I don't know the time. I  
14 don't know if it was still in the Virgin Islands or by  
15 the time I had moved to the mainland. And the issue  
16 of his actual arrest hit the news. And then with  
17 that, his arrest and being detained in New York, there  
18 was just consistent and continuous news stories about  
19 Jeffrey Epstein and his background. And, you know,  
20 what he was being accused of. And on and on.

21 So that's why I say post 2019 on is when I  
22 learned a lot more.

23 Q. What was your reaction to the news of  
24 Mr. Epstein's arrest in the summer of 2019?

25 A. Shock. Shock, literally.